

6 - 3 REPORTING VOLUMES OF LOW-LEVEL RADIOACTIVE WASTE

ISSUE: **Are volumes/tonnages of low-level radioactive waste being accurately reported and tracked?**

RESPONSE:

The Department of Environmental Quality (DEQ) Division of Radiation Control has established procedures for reporting, tracking, and auditing volumes/tonnages of low-level radioactive waste that enables reports to be reviewed and reconciled, and audits to identify any discrepancies and require adjustments in fee schedules. If changes are proposed, the costs and benefits of the change should be evaluated.

BACKGROUND:

The following information identifies aspects of the existing procedures:

- Reporting of volumes is the responsibility of the licensee and required by license condition. The amounts are important in calculation of appropriate fees.
- Envirocare is required to submit, under Condition 29B of their license, volumes (cubic feet and cubic yards) and tonnages (tons) on a quarterly basis for the following waste types:
 - Low-level radioactive waste (LLRW)
 - Low-level radioactive waste with PCBs
 - Mixed Waste (MW)
 - Mixed Waste with PCBs
 - Mixed Waste Treatment
 - Naturally Occurring Radioactive Material (NORM)
 - Containerized Class A low-level radioactive waste
 - Uranium and thorium mill tailings [11e.(2)]
 - Pre-1978 uranium and thorium mill tailings (Pre-78)
- Waste, no matter what the volume, has to be handled appropriately by specified license conditions. Reporting of volumes may be spot-checked during a generator site access transportation inspection and during routine or special inspections by Division of Radiation Control inspectors.
- Division staff check the Envirocare monthly reports submitted with the fees payment for accuracy.
- The finance staff of DEQ conduct audits of reports, but not annually. When an audit is conducted, it covers the period from the last audit to the most recent report. If errors are identified, corrections are made and required fee payments are adjusted.
- Regular audits (semi-annual or annual) of reported volumes/tonnages would require additional staff resources.
- Any generator sending waste to Envirocare who misrepresent the waste is subject to severe enforcement actions including suspension or revocation of the right to use the Envirocare site and civil or criminal penalties by the Nuclear Regulatory Commission or the Agreement State.
- Envirocare, as well, may be subject to civil or criminal penalties if it knowingly accepts waste that is mischaracterized or misrepresented by the generator, or if it knowingly mischaracterizes waste type or volume in it's reporting.